

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 9:24-cv-80283-RLR

CAROL E. DIGGES,

Plaintiff,

v.

WELLS FARGO BANK, N.A.,

Defendant.

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JOINT SCHEDULING REPORT

Plaintiff, Carol E. Digges (“Digges”), and Defendant, Wells Fargo Bank, N.A. (“Wells Fargo”) (Digges and Wells Fargo may be referred to herein collectively as the “Parties”) pursuant to Local Rule 16.1, the Court’s March 20, 2024 Order of Reference to Magistrate Judge and Order of Court-Mandated Requirements on Service, Defaults, and Joint Scheduling Reports [ECF No. 5], and the March 27, 2024 Paperless Order granting Plaintiff’s Motion for Extension of Time [ECF No. 9], hereby file this Joint Scheduling Report.

1. Recommended Case Management Track

The parties recommend that this matter be assigned to the Standard Track.

2. Discussion of Likelihood of Settlement

The parties have not yet discussed settlement, but will do so at appropriate times during this action.

3. Likelihood of Appearance in the Action of Additional Parties

At this time, the Parties do not anticipate the appearance of additional parties in this action at this time.

4. Proposed Time Limits

The parties jointly propose the following time limits:

June 28, 2024 To join other parties and amend the pleadings

May 9, 2025 To file and hear motions

March 28, 2025 To complete discovery

5. Proposal for the Formulation and Simplification of Issues

None at this time. The parties will work together to eliminate unnecessary claims and defenses and stipulate to as many facts as possible.

6. Necessity or Desirability of Amendments to Pleadings

Plaintiff is amending her Complaint and intends to file an amended pleading.

7. Possibility of Obtaining Admissions of Fact and Documents

The parties will work together in good faith to obtain as many admissions of fact and stipulations regarding the authenticity of documents as possible. Should it become necessary, counsel will meet to discuss the need for advance rulings from the Court regarding the admissibility of evidence.

8. Suggestions for the Avoidance of Unnecessary Proof and Cumulative Evidence

None at this time. Should it become necessary, counsel will meet to discuss suggestions for the avoidance of unnecessary proof and cumulative evidence.

9. Suggestions on the Advisability of Referring Matters to a Magistrate or Master

The parties do not consent to trial before a United States Magistrate Judge.

10. Preliminary Estimate of the Time Required for Trial

The Parties estimate a two (2) to three (3) day trial of this matter.

11. Requested Dates for Conferences Before Trial, Final Pretrial Conferences and Trial

The parties request a final pretrial conference on or before June 13 , 2025, and that the trial in this matter be set for a trial period commencing on or after June 23, 2025.

12. ESI and Privilege/Confidentiality Issues

The parties anticipate that there will be discovery of electronically stored information (“ESI”). In the event that discovery of ESI becomes necessary, the parties will work together to develop an ESI protocol that will cover, among other topics, the form of production.

The parties anticipate the discovery of confidential information and will work together to draft a stipulated confidentiality order that includes, among other things, a provision addressing inadvertent production and a claw-back provision pursuant to Federal Rule of Evidence 502.

13. Any Other Information That Might be Helpful to the Court in Setting this Case for Status or Pretrial Conference

None at this time.

DATED this 5th day of April 2024.

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